

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROFESSOR MASAHIRO IIDA,

Plaintiff,

vs.

INTEL CORPORATION,

Defendant.

Case No. 6:22-cv-00662-ADA

**DECLARATION OF JARROD BLACKBURN REGARDING INTEL CORPORATION'S
MOTION FOR INTRA-DISTRICT TRANSFER PURSUANT TO 28 U.S.C. § 1404(A)**

I, Jarrod Blackburn, declare as follows:

1. I am currently employed by Intel Corporation ("Intel") as a Software Enabling and Optimization Architect. I work at Intel's campus in Austin, Texas. I submit this declaration in support of Intel's motion for intra-district transfer in the above-captioned litigation. I am over 18 years of age. This declaration is based on my personal knowledge, and if called as a witness to testify in this matter, I could and would testify to the facts as set forth herein.

2. I was hired in November 2004 by Altera Corporation ("Altera"), which was a developer of field programmable gate array ("FPGA") devices before being acquired by Intel. At Altera I was an application engineer who provided technical support to customers of Altera's FPGA products. I continued working as an application engineer for FPGA devices following Intel's acquisition of Altera. My current work includes identifying customer issues that need to be documented and advising on features for improving Intel's FPGA devices.

3. I understand that Plaintiff Masahiro Iida has sued Intel for allegedly infringing U.S. Patent No. 6,812,737 (the "asserted patent"). I understand that the asserted patent relates to

the configuration of look-up tables (“LUTs”) in programmable logic devices and that the products accused of infringement include FPGA devices that employ adaptive logic modules (“ALMs”).

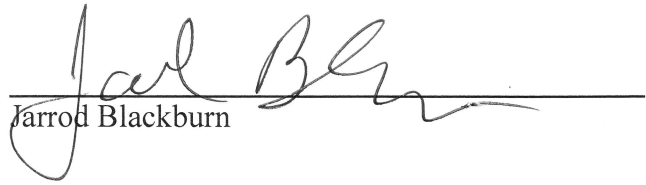
4. Based on my work providing technical support to customers of FPGA devices, I have general knowledge of, and access to documents describing, Intel’s FPGA devices and the functionality of the LUTs and ALM in those devices.

5. Currently, I am part of Intel’s Customer Experience Group (“CEG”), which includes engineers like myself who provide technical support and training to customers of Intel’s FPGA devices. The CEG is responsible for creating and maintaining training documentation, technical documents, as well as publicly-available data sheets that describe the functionality of the various aspects of FPGA devices, including the LUTs and ALM.

6. I understand that Plaintiff filed this case in the Waco Division of the United States District Court for the Western District of Texas, which I understand includes the following counties: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. To my knowledge, there are no Intel employees who have knowledge regarding the architecture of the ALM or configuration of LUTs in Intel’s FPGA devices that work in Waco, Texas, or the other counties that I understand comprise the Waco Division of the Western District of Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 16, 2022 in Austin, Texas.

A handwritten signature in black ink, appearing to read "Jarrod Blackburn", is written over a horizontal line. The signature is stylized with a large initial "J" and a long, sweeping underline.

Jarrod Blackburn